REMARKS/ARGUMENT

The Examiner is thanked for the careful review of this application. Claims 1-16 are pending after entry of this Amendment. No claim amendments are submitted, and no new matter is introduced.

Rejections under 35 USC §102

Claims 1-7 and 10-16 were rejected under 35 USC §102(e) as anticipated by IBMLdap (IBM LDAP Implementation Cookbook, Johner et al., June 1999, IBM, hereinafter "IBMLdap"). The rejections are traversed, and Applicants request reconsideration.

The Office asserts that the reference discloses the features of claims 1, 10, and 14 at page 32, and pages 163-165 of the IBMLdap reference. Applicants respectfully submit that the reference, and specifically the cited sections, disclose that which Applicants describe that the prior art discloses in Applicants' specification as filed at pages 1-2. Specifically, Applicants describe that the "LDAP directory service model is based on entries. Each entry in LDAP comprises a collection of attributes. In turn, each attribute consists of a type and one or more values. The type of an attribute identifies the format of the data contained in the values of that attribute" (page 1, lines 25-28). Further, "Entries in an LDAP directory service are organized in a tree structure. Under the protocol, data may be stored in any arbitrary fashion, as long as a tree structure is maintained" (page 2, lines 1-2).

The cited sections of the IBMLdap reference describe *objects* and the structure of *objects*. Applicants have claimed management and structure of *directories*. While it is true that directories are populated with objects, and therefore described with reference to objects, the reference fails to disclose a method or management of directories as claimed by Applicants.

In order for a reference to anticipate a claim, each and every element as set forth in the claim must be found in the reference, either expressly or inherently described. MPEP 2131. Applicant respectfully submits that the IBMLdap reference does not anticipate Applicant's independent claims 1, 10, or 14.

In claim 1, Applicants claim a method for managing a *directory* comprising the steps of creating a template to define *the directory* comprising one or more definitions corresponding to one or more object types. In claim 10, Applicants claim a template for managing a *directory*. In claim 14, Applicants claim a method for managing a *directory* of one or more entries comprising the steps of creating a template to provide one or more

instruction on how to manage *the directory*. The cited reference discloses the creation and structure of object classes, noting only that the instantiated structural object classes become directory entries, and, as disclosed by Applicants in the Background of the Invention, the instantiated object classes comprise a collection of attributes, which each attribute consisting of a type and one or more values. The reference does not, however, disclose the management or structure of directories as claimed by Applicants.

The Examiner is kindly directed to page 32 of the IBMLdap reference, second paragraph, in which the reference states that "An abstract object class is used as a template for creating other *object classes*." Applicants have claimed creating a template to define *the directory*. The reference does not disclose a template to define the directory, and therefore does not anticipate Applicants' claims 1, 10, or 14.

Stated in terms used by the reference itself, "Schema defines rules for distinguished names and what attributes an entry must and/or may contain. To organize the information stored in LDAP directory entries, the schema defines *object classes*. An object class consists of a set of *mandatory* and *optional* attributes" (page 32, first paragraph). The reference discloses of what is stored or listed *in* the directories, *i.e.*, the directory entries, and, at least in part, the structure of *contents* of the directory entries, *i.e.*, object classes. The reference does not, however, disclose management or structure of the directory.

Applicants further claim for a given one of said object types, said corresponding definition identifies zero or more others of said object types *to be automatically created and added* to the directory whenever said given object type is added to the directory. Pages 163-165 disclose the process for defining a new object class. While *attributes* of a parent object class can be inherited (see page 165) by the new object class, this does not disclose the identifying zero or more others of said object type to be automatically created and added to the directory. Nothing in the reference discloses automatically creating and adding one or more others of said object type to a directory. Nothing in the process illustrated and described at pages 163-165 appears to be automatic at all.

For at least the above reasons, the IBMLdap reference fails to disclose each and every element as set forth in Applicants' independent claims 1, 10, or 14. The reference therefore fails to anticipate Applicants' independent claims 1, 10, or 14. Each of dependent claims 2-7, 11-13, and 15-16 depend, directly or indirectly from one of independent claims 1, 10 and 14, and the reference therefore fails to anticipate Applicants' dependent claims for at least the

same reasons that it fails to anticipate the independent claims. Applicants therefore respectfully request reconsideration, and request that these rejections be withdrawn.

Rejections under 35 USC §103

Claims 8-9 were rejected under 35 USC §103(a) as being unpatentable over IBMLdap as applied to claims 1-7 and 10-14, and further in view of XMLanp (XML Articles and Papers, January - March, 2000, a Google search result, 11/21/04, hereinafter "XMLanp").

According to the Office, the IBMLdap reference discloses an "LDAP template is created by using 'a generalized markup language' at page 133" of the reference, which discusses configuration. However, Applicants note that nothing in the configuration section of the IBMLdap reference discloses a template to define a directory, as claimed in Applicants' independent claim 1, from which claims 8-9 depend. Further, the XMLanp reference, while disclosing a product called DirXML as using LDAP to connect to other directories, fails to disclose a template to define the directory.

To establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the reference or in the knowledge generally available to one having ordinary skill in the art, to modify the reference. Additionally, there must be a reasonable expectation of success, and the reference when modified must teach or suggest all of the claim features. Modifications to prior art that are within the skill of one of ordinary skill in the art at the time of invention is insufficient to establish a *prima facie* case of obviousness without some objective reason to modify. The mere fact that a reference <u>can</u> be modified does not render the resultant modification obvious unless the prior art also suggest the desirability of the combination. (See MPEP <u>§2143</u>.) That is, the teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in the applicant's disclosure. Applicants respectfully submit a *prima facie* case of obviousness is not supported against claims 8-9.
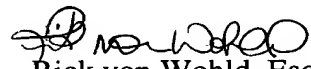
For at least the reason that the combination of IBMLdap and XMLanp fail to teach or suggest all of the claim features of Applicants' claims 8-9, Applicants respectfully submit that claims 8-9 are patentable over IBMLdap in further view of XMLanp under 35 USC §103(a). Applicants request reconsideration and that the rejections be withdrawn.

In view of the foregoing, Applicants respectfully request reconsideration of claims 1-16. Applicants submit that all claims are in condition for allowance. Accordingly, a notice of

allowance is respectfully requested. If Examiner has any questions concerning the present Amendment, the Examiner is kindly requested to contact the undersigned at (408) 749-6900, ext. 6905. If any additional fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. SUNMP506). A copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
MARTINE PENILLA & GENCARELLA, LLP

Rick von Wohld, Esq.
Reg. No. 48,018

MARTINE PENILLA & GENCARELLA, LLP
710 Lakeway Drive, Suite 200
Sunnyvale, California 94085
Customer Number 32291